

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA** )  
                                  )  
v.                               )  
                                  )      **No. 3:20-cr-00165**  
                                  )  
**CALEB D. JORDAN**          )

**UNOPPOSED MOTION TO CONTINUE TRIAL  
AND TO EXTEND PRETRIAL DEADLINES**

Caleb Jordan, through undersigned counsel, hereby moves this Honorable Court to continue the trial and to extend the pretrial deadlines. In support of this Motion, undersigned counsel would show the Court the following:

1. The trial is set to commence on September 13, 2022. The deadline for pretrial motions is August 1, 2022 (D/E 69).
2. Mr. Jordan is charged with seven counts of production of child pornography, in violation of 18 U.S.C. §§ 2251(a) and (e) (Counts 1-7); extortion, in violation of 18 U.S.C. § 875(b) (Count 8); distribution of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A) (Count 9); and possession of child pornography, in violation of 18 U.S.C. § 2252A(5)(b) (Count 10). If convicted as charged in the indictment, Mr. Jordan faces a minimum of 15 years imprisonment, up to, should consecutive sentencing be imposed, an effective sentence of life imprisonment.
3. The defense investigation and trial preparation are ongoing but not complete due to the voluminous nature of the discovery materials and complex personal history of the defendant. Due to delays in the supplemental budgeting process, certain experts were unable to provide necessary services until recently, and their work is not yet completed. As a result of these collective

circumstances, undersigned counsel cannot fully advise Mr. Jordan of his defenses, cannot determine the appropriateness of pretrial motions, cannot render a fully informed recommendation as to his options for resolving this case, and cannot adequately prepare for trial.

4. Notwithstanding defense counsels' need for additional time to effectively advise Mr. Jordan and/or prepare for trial, they have each devoted substantial time reviewing the government's evidence and investigating the defense theory, all of which has enabled them to begin engaging in reasonably informed settlement discussions with the government. The parties will be unable to consummate any plea agreement, however, until certain defense experts complete their work because their work will bear on plea negotiations.

5. Mr. Jordan requests a continuance so that his counsel can complete their investigation of the government's case and defenses thereto, pursue fully informed settlement discussions and, if an agreement cannot be reached, prepare for trial. Without a continuance of the trial date and an extension of the pretrial deadlines, undersigned counsel will be unable to provide Mr. Jordan with effective assistance of counsel as guaranteed by the Sixth Amendment to the United States Constitution.

6. Undersigned counsel have conferred with AUSA Carrie Daughtrey regarding the need for a continuance of the trial. She indicated she has no objection to this motion. Counsel for the parties, having considered their respective calendars over the coming months, suggest that the trial be continued to either January 31, 2023 or February 7, 2023.

7. Mr. Jordan's Speedy Trial Waiver is submitted herewith. A continuance as requested herein will serve the interests of justice for both the defendant and the public.

Respectfully submitted,

s/Kathleen G. Morris

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**Certificate of Service**

I hereby certify that I filed this document through the Court's electronic filing system which generated a notification thereof to Assistant United States Attorney Carrie Daughtrey, 110 Ninth Avenue South, Suite A-961, this 21<sup>st</sup> day of July 2022.

s/Kathleen G. Morris

Kathleen G. Morris